UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

14-cv-9126-ALC

v.

ANTHONY THOMPSON, ET AL.,

Defendants,

PLAINTIFF'S APPLICATION FOR AN ORDER TO SHOW CAUSE WHY DEFENDANT ANTHONY THOMPSON SHOULD NOT BE HELD IN CIVIL CONTEMPT

Plaintiff Securities and Exchange Commission (the "Commission") respectfully requests that this Court issue an Order to Show Cause why Anthony Thompson ("Thompson") should not be held in civil contempt for failing to pay the disgorgement obligation ordered by this Court, despite having an ability pay. Since entry of the December 30, 2020 Judgment (the "Judgment"), Thompson has been earning substantial income yet paying *nothing* toward the Court's Judgment. In support of this motion, the Commission submits the Declaration of Maureen Peyton King and attachments thereto and a memorandum of law in support of this motion. For the reasons set forth in the supporting documents, the Commission respectfully requests that the Court grant its motion and enter the proposed Order to Show Cause.

Dated: New York, New York

September 23, 2021

s/ Maureen Peyton King

Maureen Peyton King Senior Trial Counsel Securities and Exchange Commission New York Regional Office 200 Vesey Street, Room 400 New York, NY 10281-1022

Tel.: 212-336-0111

E-mail: kingmp@sec.gov